

July 3, 2019

VIA ELECTRONIC FILING

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Reference: WT Docket No. 17-200, In the Matter of Review of the Commission's Rules Governing the 896-901/935-940 MHz Band

Dear Ms. Dortch:

Black & Veatch thanks the Chairman and Commissioners of the Federal Communications Commission (FCC) for the opportunity to respond to WT Docket No. 17-200, In the Matter of Review of the Commission's Rules Governing the 896-901/935-940 MHz Band (the NPRM). Black & Veatch supports the NPRM and specifically endorses the reallocation of a band of spectrum for use by Critical Infrastructure Industry (CII) for broadband networks. The band realignment process must be thoughtfully planned and clearly defined to adequately support narrowband needs of Critical Infrastructure and other users. The band realignment processes must enable a timely and efficient transition without undue burden on incumbent spectrum holders.

Black & Veatch is an employee-owned, global leader in building critical human infrastructure in Energy, Water, Telecommunications and Government Services. Since 1915, we have helped our clients improve the lives of people in over 100 countries through consulting, engineering, construction, operations and program management. Our revenues in 2018 were US\$3.45 billion.

Black & Veatch has significant telecommunications network design and engineering knowledge, including experience with all the major licensed and unlicensed radio bands. Black & Veatch credentials include many diverse implementation roles for many narrow and broadband radio networks, supporting both voice and data applications for companies operating in many sectors.

Black & Veatch continually works with visionary customers who see the potential wireless broadband offers and are interested in exploring the available methods to achieve this potential. The 900 MHz broadband is one of only a few available private wireless broadband options. The reach and bandwidth potential would undoubtedly be selected by many customers if the NPRM is implemented. In the current regulatory environment, most utilities currently lack affordable access to broadband spectrum. Moreover, utilities are under increasing demand to support smart grid and other applications that would benefit from broadband wireless. While 3 MHz of broadband is not capable of meeting all utility broadband needs, it will enable utilities to meet some of their increasing capacity and coverage communications requirements. Additional private wireless broadband options will also be required.

The Commission's recent Notice of Proposed Rulemaking (NPRM) to re-align the 900 MHz band for broadband services is a significant, positive step forward. The 900 MHz band private broadband option may enable our clients' requirements to be met in a time frame that is consistent with their needs for a standardized platform for wireless communications. It may also allow Black & Veatch to

help expand the adoption of Private LTE networks and continue the future development and constant innovation in wireless technology.

Moving forward, the 900 MHz band offers our clients an opportunity to pursue a range of capabilities and options that not only help the utility industry, but very likely will help other industries with private wireless needs. We believe moving broadband 900 MHz to market will be transformative, through the evolution of the Industrial IoT (Internet of Things) marketplace, the availability of private networks that can meet critical cyber security and reliability needs and the global scale of LTE development.

We applaud the Commission for its efforts in this proceeding. We respectfully request the commission move as expeditiously as possible to facilitate a final Order which addresses the concerns above and enables a new broadband option for all interested parties.

Sincerely,

Gregory McGovern
Senior Wireless Engineering Manager
Black & Veatch